IN THE HIGH COURT OF JUDICATURE OF BOMBAY,

AT PORVORIM, GOA

PIL WRIT PETITION (L) NO.2344 OF 2024

IN THE MATTER OF:

THE GOA FOUNDATION ...PETITIONER

VERSUS

STATE OF GOA & ORS. ...RESPONDENTS

LIMITED AFFIDAVIT-IN-REPLY ON BEHALF OF THE TOWN AND COUNTRY PLANNING DEPARTMENT

I, Rajesh Naik, aged 60 years, Indian Inhabitant, being the Chief Town Planner (Planning), having my office at 2nd Floor, Dempo Towers, Patto, Panjim, Goa- 403001, do hereby, solemnly affirm and state as under:

1. I say that I am the authorized signatory of the Town and Country Planning Department, Respondent No. 3 in the captioned Petition("**this Respondent**"). I say that I am aware of the facts of the matter on the basis of the records maintained by this Respondent and am therefore able to depose to the same.

2. I deny all the contentions, averments and allegations made by the Petitioner in the captioned Petition, which are inconsistent with

and/or contrary to all that is set out herein. Nothing in the captioned Petition is admitted or should be deemed to be admitted by this Respondent for want of *specific traverse* or otherwise. This Respondent is filing the present reply for the limited purpose of opposing the grant of any ad-interim/interim relief in favour of the Petitioner. Due to paucity of time, this Respondent is not dealing with the captioned Petition paragraph wise. This Respondent however reserves its right and craves leave of this Hon'ble Court to file a detailed affidavit in reply at a later stage.

3. The captioned Petition *inter alia* seeks the following reliefs:

(a) Quashing and setting aside Section 39A of the Goa, Daman and Diu Town and Country Planning Act, 1976 ("**TCP Act**") ("**Impugned Section**") introduced by the Goa Town and Country Planning (Amendment) Act, 2024 (Goa Act 3 of 2024).

(b) Quashing and setting aside Sections 100A and 101A of the TCP Act.

(c) Quashing and setting aside the Goa Town and Country Planning (Change of zone of land in the Regional Plan or the Outline Development Plan) Rules, 2023 ("**Impugned Rules**").

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(d) Quashing and setting aside the proviso to Regulation 6.1.1(d) of the Goa Land Development and Building Constriction Regulations, 2010 ("**GLDBCR 2010**") and the definition of "zone" thereunder.

The Petitioner is also seeking certain ad-interim/interim relief in the form of direction against the Respondents to stay processing of further applications or zone changes under Section 39A of the TCP Act pending the hearing and final disposal of the captioned Petition.

4. I say that while considering a challenge to the constitutional validity of statutory provisions, the following settled principles ought to be considered. Firstly, there is a presumption in favour of constitutionality of the provisions. Any attempt to dislodge such presumption requires a high threshold and there is a heavy burden on the Petitioner to prove beyond reasonable doubt that there is a clear transgression of constitutional provision. Secondly, it must be presumed that the Legislature correctly understands and appreciates the needs and problems of the citizens, and the laws are accordingly made to deal with those problems and needs. Thirdly, unconstitutionality and not unwisdom is the narrow area of judicial review and provisions cannot be invalidated based on

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perceptions. Fourthly, even if two views are possible, the courts will lean towards the view which upholds the constitutionality of the provision.

5. Without prejudice to this Respondent's contention that the Impugned Section and the Impugned Rules are constitutionally valid, it is submitted that it is trite law that a statute is presumed to be constitutional unless the same is set aside after final hearing and therefore merely because the constitutional validity of a statute is challenged the operation of the provision ought not to be stayed. The courts exercise judicial restraint in staying the applicability of a statutory provision. Keeping the aforesaid position of law in mind, it is submitted that merely because the Petitioner has challenged the constitutional validity of the Impugned Section and the Impugned Rules, the operation of the said provisions (including the powers contained therein) ought not to be stayed pending the hearing and final disposal of the captioned Petition.

6. I say that the ad-interim/interim relief sought by the Petitioner in the captioned Petition by way of a restraint on the Respondent authorities to process applications under the Impugned Section would effectively amount to a stay on the operation of the Impugned Section itself. As demonstrated above, such a measure

should not be taken at this interim stage and without affording an opportunity to this Respondent to file a detailed reply to the captioned Petition. Further, the Petitioner has failed to make out any case for grant of any interim reliefs in its favour let alone the high burden required in such cases.

7. Without prejudice to the aforesaid, it is submitted that the Impugned Section is *inter alia* challenged on the ground that it is contrary to the scheme of the TCP Act and violates the Petitioners' fundamental rights under Article 14 and Article 21 of the Constitution of India. The issue as to whether the Impugned Section is manifestly arbitrary and/or impinges upon the Petitioners' fundamental rights requires a final determination which can be made only after this Respondent has been provided an adequate opportunity to file a detailed reply to the captioned Petition. It is therefore submitted that at this interim stage, the operation of the Impugned Section cannot and ought not to be stayed, as prayed for by the Petitioners.

8. Without prejudice to the aforesaid, it is submitted that the captioned Petition proceeds on a completely erroneous basis and fails to consider several basic aspects pertaining to the process of town planning. It is submitted that town planning is a dynamic and

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constantly evolving process which keeps changing with time and cannot be static.

9. The purpose and scheme of the TCP Act indicates that the Act has been enacted to provide for planning the development and use of rural and urban land in the Union Territory of Goa, Daman and Diu and for the purposes connected therewith. The statement of objects and reasons of the TCP Act indicates that a need was felt that there should be a consolidated piece of legislation for creating conditions favourable for planning and replanning of urban and rural areas in Goa, providing full civic and social amenities for the people and also to stop uncontrolled development of land due to land speculation and profiteering in lands. Keeping in mind the object with which the TCP Act was enacted and the provisions thereof, the following important aspects are to be kept in mind:

(a) The scheme of the TCP Act is, primarily, focused on planning and development of the land in the entire State of Goa. The TCP Act provides for development plans from macro to micro level which includes specifying the land to be used for providing various public amenities and services. That is the precise reason that the expression "development" under Section 2(10) of the TCP Act has

been defined in very wide terms. It is difficult to comprehend any activity relating to land and planning which could fall outside the scope of this definition.

(b) The TCP Act also contains necessary provisions for periodically carrying out revisions/ alterations/modifications to the Development/Regional Plan, basis the requirements of the region keeping in mind the needs and requirements as per diverse situations including the diversity of the region, ecological considerations as well as the development activities being undertaken in the region.

(c) Section 44 of the TCP Act specifically contemplates the right of an individual to seek change of user of the land for development and upon payment of development charges in respect thereof.

(d) Further, as contemplated in various planning statutes, the TCP Act also seeks to levy charges for development of land in the manner prescribed therein.

(e) The TCP Act as originally enacted contemplated carrying out minor modifications in a Development Plan for

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correcting (i) typographical/cartographical errors; (ii) omissions or details of the proposals not fully indicated in the Plan; and (iii) changes arising out of implementation of the proposals in the Development Plan. The only requirement for such an alteration is that it is a minor modification, and it is in public interest and is notified to the public.

10. It is submitted that if Section 39A of the TCP Act is read in the context of the aforesaid larger scheme of the Act, the same fits into the spirit and scheme of the Act. If that be the case, the Petitioner cannot challenge the validity of the Impugned Section in the absence of challenge to the original scheme of the TCP Act. On this ground itself it is submitted that the captioned PIL deserves to be dismissed.

11. It is further submitted that prior to the insertion of the Impugned Section, the TCP Act did not contain any provision to modify/amend the Regional Plan or the Outline Development Plan to factor in housing, commercial and infrastructure requirements of the State of Goa. The provision contained in Section 17 (1) of the TCP Act provides for revision of the Regional Plan, which is a detailed, time-consuming and long drawn process. Even the power

to undertake modifications/alterations under Section 17 (2) operates in a narrow sphere in as much as it is limited to correcting inadvertent errors and inconsistent and incoherent zoning proposals. Even the provision contained in Section 16B did not empower the State Government to modify the Regional Plan/ Outline Development Plan to address the requirement of power to the Government to carry out amendment in keeping with the development policy of the State. It is in this backdrop that Section 39A came to be inserted in the TCP Act.

12. It is also pertinent to note that other planning statutes also contain similar provisions for change of user of the land upon payment of development charges for the same and such provisions are valid and do not impinge any constitutional rights of the citizens. For example, Section 18 of the Maharashtra Regional and Town Planning Act grants an individual the right to apply to the concerned Municipal Corporation or Municipal Council for change the use of any land for agriculture or carry out any development in respect of any land after the draft Regional Plan has been notified or approved. A similar provision enabling individual landowners to make an application for change of land use is contained in the Karnataka Town and Country Planning Act,

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1961 as well as the Punjab Regional and Town Planning and Development Act, 1995.

13. Without prejudice to the aforesaid, it is submitted that the validity of the alterations /modifications made to a Regional Plan may be tested on the touchstone of the following twin tests.

(a) First, whether the alteration / modification is for the purposes of effective implementation of the Regional Plan and to keep pace with the development process of the region and the felt necessities for such developmental purpose.

(b) Second, whether the alteration / modification is such that there is an alteration in the character of the Regional Plan. Whether an alteration / modification alters the character of the Regional Plan is to be tested on the anvil of the following parameters:

(i) Whether the proposed alteration / modification in the Regional Plan brings about the loss of identity of the original plan as a whole?

(ii) By such alteration / modification, would the original Regional Plan become unrecognizable?

(iii) Whether the proposed alteration/ modification result in change in a zone (for instance from orchard zone to settlement zone) which alters the basic character of the entire Regional Plan?

(iv) Whether such proposed alteration/modification would result in the disappearance of the distinguishing features of the Regional Plan?

(v) Whether the alteration/modification in the Regional Plan can be said to destroy the characteristic feature of the Regional Plan?

14. In this regard, Impugned Section itself provides that the alteration or modification carried out thereunder shall not alter the overall character of the existing Regional Plan and/or the Outline Development Plan. I say that this is a very important safeguard contemplated in the Impugned Section itself, which the Petitioner has chosen to ignore. That being the case, it is submitted that the Impugned Section cannot be said to be unconstitutional.

15. Without prejudice to the aforesaid, it is submitted that the Impugned Rules prescribe the procedure to be followed prior to

notification of alteration/modifications contemplated under the Impugned Section.

a. The first step will be that the Chief Town Planner (Planning) will receive the direction from the Government or an application from an individual. [*Rule 4(1) of the Impugned Rules*]

b. Thereafter, the Chief Town Planner (Planning), shall give notice of the proposed change of zone of land by a notification published in the Official Gazette and in two local newspapers inviting suggestions from the public within a period of thirty days from the date of publication of the notification in the Official Gazette and local newspapers. [*Rule 4(1) of the Impugned Rules*]

c. The third step is that the suggestions, if any, received in respect of the proposed change of zone of land shall be scrutinized by this Respondent, by following guidelines specified in Rule 6 of the Impugned Rules. [*Rule 4(2) of the Impugned Rules*]

d. Thereafter, upon expiry of such period of thirty days, the proposal for change of zone of land along with suggestions,

if any received, shall be placed before the Goa Town and Country Planning Board (**"TCP Board"**) for its recommendation/approval. [*Rule 4(3) of the Impugned Rules*]

e. The recommendation / decision of the TCP Board shall then be placed before the Government of Goa for decision under Rule 4(4) of the Impugned Rules. [*Rule 4(4) of the Impugned Rules*]

f. Only upon approval from the Government will the Chief Town Planner (Planning) alter / modify the Regional Plan or the Development Plan for carrying out the change of zone of any land therein. [*Rule 4(5) of the Impugned Rules*]

g. Each alteration / modification to the Regional Plan or Development Plan shall be published by the Chief Town Planner (Planning) by notification in the official gazette. [*Rule 6 of the Impugned Rules*]

h. The Impugned Rulesalso restrict the proposed modifications/alterations to the Regional Plan / Development Plan to the extent specified therein. Such restrictions include prohibition of consideration of eco-sensitive lands or change

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of zone, including any past commitment / approval / sanad granted in respect thereof.[*Rule 5 of the Impugned Rules*]

16. I say that it is therefore clear that the procedure prescribed under the Impugned Rules is in consonance with the provisions of the TCP Act and ensures that there are sufficient checks and balances in the manner in which the power is exercised.

17. It is a well-accepted principle in a series of decisions of the Hon'ble Supreme Court of India and this Hon'ble Court that town planning is a matter involving technical and scientific expertise and the court gives weightage to the views of experts in the field and does not substitute its own views in place of the views of the experts. It is equally trite law that town and country planning involving development of land in towns and cities is achieved through the process of land use, zoning plan and regulating building activities which is a highly complex exercise undertaken by experts on the basis of study, experience and scientific research which has to be given due reverence.

18. I say that the challenge to the Impugned Section and Impugned Rules must be appreciated in the light of the purpose for which the TCP Act has been enacted, coupled with the fact that there is no

dispute as regards the legislative competence of the State Legislature to legislate on the said subject.

19. I say that such legislation needs to be looked at from a broad perspective considering the larger public interest and the role of the State in such situations, rather than looking at the same from a hyper-technical / narrow perspective, as is sought to be done by the Petitioner.

20. I say that the challenges raised in the Petition are extremely vague. Apart from contending that the Impugned provisions are arbitrary, unreasonable and in violation of Articles 14 and 21 of the Constitution and/or provisions of the TCP Act, the Petitioner has not pleaded or made out any legally sustainable challenge.

21. I say that the Petitioner's primary challenge to the Impugned Section is based on the ground that there is alleged vesting of arbitrary, absolute and unguided powers in the Respondents based on private requests of individuals. The Petitioner has contended that under Section 39A of the Act private individuals can ask for change of zone which overrides public interest. It is alleged that the time-period for objecting to the alterations/modifications have been reduced which is not in conformity with the provisions of the

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TCP Act. It has also been alleged that sweeping changes would be allowed under Impugned Section in the interest of the developers.

22. I say that these challenges / allegations are misconceived. I say that neither does the Impugned Section / Impugned Rules confer unbridled and unguided powers to make changes based on purported private demands without following the procedure, nor are the Impugned Section / Impugned Rules arbitrary or unconstitutional in any manner. I say that the Impugned Section only empowers this Respondent to entertain applications for change of zone, and then follow the detailed procedure prescribed (as elaborated hereinabove), which procedure includes important safeguards such as inviting public suggestions, scrutiny of the suggestions, scrutiny of the applications (along with suggestions from the public) by the TCP Board and receiving the TCP Board's recommendation/approval, and seeking the approval of the Government. More importantly, the ultimate power to make changes lies with the Government. I say that the fact that the power has been vested by the State Legislature not in any officer, but in the State Government which is by itself a guarantee that the power would be exercised in conformity with the provisions of the Act.

23. As far as the contention regarding the Impugned Section being made in favour of developers etc. is concerned, I say that the same is a thinly disguised attempt at questioning the law of the legislature based on malice, which in any event cannot be considered at the interim stage that too without affording this Respondent an adequate opportunity to file a detailed reply. It is trite law that a law is made by a body of elective representatives of the people, and while malice may furnish a ground in an appropriate case to veto administrative action, it is a trite position that malice does not furnish a ground to attack a plenary law. It is equally settled law that legislature, as a body, cannot be accused of having extraneous purpose and the concept of "transferred malice" is unknown in the field of legislation. That *mala fides* or ulterior motives attributed to a State Legislature in making a law within its competence can never make such law unconstitutional is well settled. In any case, such general and vague allegations ought not to be entertained, more so when it comes to dealing with alleged legislative *malafides*.

24. In view of the aforesaid, it is evident that the Impugned Section and the Impugned Rules are neither arbitrary nor do they grant unfettered powers to the Government, as is sought to be contended, and the same is in conformity with the scheme of the TCP Act as

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well as other town planning statues in India. I accordingly say that the Impugned Section does not in any manner impinge upon the right of the citizens to planned/sustainable development. I therefore say that the Impugned Section and the Impugned Rules do not suffer from any infirmity and are not *ultra vires* the Constitution of India.

25. In light of the aforesaid, the Petitioner's apprehension regarding misuse of the powers vested in the Government is unfounded, baseless and unsubstantiated. In any event, I submit that it is a settled position of law that possibility of abuse of powers under the provisions contained in any statute is no ground for declaring the provision to be unconstitutional. Be that as it may, it is submitted that the Impugned Section does not permit arbitrary ad-hoc untrammeled alterations/modifications to the Regional Plan / Development Plan. Rather, the provision visualizes a democratic process wherein a balance is struck between the organized development of the State and its ecological and geographical preservation.

26. Without prejudice to the aforesaid, I submit that the processing of the applications under the Impugned Section is required to be undertaken keeping in mind the fact that the

alterations/modifications proposed to be made do not lead to a change in the character of the Regional Plan / Development Plan, which is a very critical protection contained in the Impugned Section itself.

27. In so far as the Petitioner's challenge to the Impugned Section on the ground of reduced time period for public participation while altering/modifying the Regional Plan is concerned, it is submitted that for the reasons stated hereinbelow, the same is devoid of any merit since the 60 day period as envisaged during the preparation or revision of the Regional Plan / Development Plan is granted since the same is a comprehensive exercise on a larger scale, and does not pertain to individual changes. Therefore, the time-period of 30 days for submission of suggestions by the public prescribed under the Impugned Section is adequate and does not in any manner hinder the validity of the Impugned Rules.

28. For the foregoing reasons, I say that the procedure contemplated under Section 39A of the Act is in consonance with the object and spirit of the TCP Act and does not suffer from any infirmities.

29. Further, as per the Petitioner's own admission, Section 39A of the TCP Act is akin the proviso to Regulation 6.1.1 (d) of the GLDBCR-2010, which contains a similar provision for an

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individual to apply for zone change. Thus, the provision permitting change of zone based on application made by an individual has been in operation for over 14 years now and insertion of Section 39A of the TCP Act cannot be considered to be the starting point for determining the cause of action.

30. The Petitioner's contention regarding the placement of Section 39A *i.e.*, that Section 39A has been included under Chapter VI, which deals with 'Preparation of Development Plan' and a provision granting to the Chief Town Planner (Planning) the power to 'alter or modify the Regional Plan' moves beyond the ambit and scope of 'Preparation of Development Plans', is of no relevance and/or consequence in respect of determining the validity of the said Section. In any event, it is submitted that it is a settled position of law that the headings prefixed to sections cannot control the plain words of the provisions; they cannot also be referred to for the purpose of construing the provision when the words used in the provision are clear and unambiguous; nor can they be used for cutting down the plain meaning of the words in the provisionwhen words of the statute are express and clear. In the present case, the words of Section 39A of the TCP Act are clear and unambiguous and therefore the chapter under which the said provision has been inserted is an irrelevant consideration. Without prejudice to the

above, it is submitted that given that Section 39A of the TCP Act also contemplates/provides for alteration/modification of the Outline Development Plan its inclusion in Chapter VI of the TCP Actis justified and cannot be faulted.

31. The Petitioner's contention that the Impugned Section supersedes the authority of the Planning and Development Authorities over Planning Areas since power has been granted to this Respondent to modify the Development Plan is also misconceived. Wide powers have been conferred on the TCP Board under the TCP Act. I say that Section 8 of the TCP Act empowers the TCP Board to advise on the planning and implementation of physical development programs within the Union territory as well as to perform such other functions as are incidental, supplemental or consequential to any of the functions which may be prescribed. Under Section 8 the TCP Board is duty bound to exercise all such powers as may be necessary or expedient for the purpose of carrying out its functions under the TCP Act. The provisions of the TCP Act indicate that the TCP Board is fully associated with the working of the TCP Act and in particular the activities of the Planning and Development Authorities and is the appellate authority in this regard. Besides the knowledge of the working of the TCP Act, the TCP Board is an all-representative body which

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includes experts also. It can, therefore, dispassionately examine all the relevant facets of the planning of a particular area before expressing its views to the Government when it is consulted under the provisions of the TCP Act. It is therefore submitted that the recommendations of the TCP Board are taken into consideration by the Government before the Government issues any notification under the TCP Act. In view of the aforesaid, the allegations of the Petitioner in this regard are baseless and devoid of any merit and deserves to be dismissed.

32. In addition to the aforesaid, the Petitioner has, by way of the captioned Petition, also challenged the definition of the term 'zone' contained in Section 2 (149) of the GLDBCR-2010 as well as the proviso to Regulation 6.1.1. (d) of the GLDBCR-2010. I say that the Petitioner has already challenged the said provisions of the GLDBRC-2010 by way of PIL No. 16 of 2023, which is presently sub-judice and cannot and ought not to be permitted to agitate the same issue again. Without prejudice to the aforesaid, I further say that the said provisions have been in operation and effect for over 12 years. The challenge to the aforesaid provisions is belated and suffers from gross unexplained delay and laches and ought not to be entertained as the Petitioner has failed to approach this Hon'ble Court in a timely manner. In any case the said provision has stood

the test of time and there is nothing wrong or impermissible with said provision. In any event and without prejudice to the aforesaid, there is no illegality in the said provision, as alleged or otherwise.

33. Similarly, the Petitioner has also the validity of Section 100A and 101A of the TCP Act. The said Sections were introduced in the TCP Act by way of Amendment Act 31 of 2001 and the said provisions have been in operation and effect for over 23 years. There is gross delay in challenging the aforesaid provisions and the same ought not to be entertained. In any case the said provisions have also stood the test of time and there is nothing wrong or impermissible with said provision. In fact, various other planning statutes across India have similar provisions. In any event and without prejudice to the aforesaid, there is no illegality in the said provisions, as alleged or otherwise.

34. It is further submitted that the provisions of a statute can be challenged only on two grounds, namely lack of legislative competence and violation of any provisions of Part-III of the Constitution of India. In the instant case, provisions of the TCP Act, cannot be questioned on any of the aforesaid grounds and the Petitioner has not made out any ground for the same. In so far as GLDBRC-2010 is concerned, it is submitted that, regulations and

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subordinate legislation, can be challenged only on the ground that the regulations are *ultra vires* the Parent Act or violate any provisions of Part – III of the Constitution of India. In respect of the Impugned Regulations, none of the aforesaid grounds are pleaded or established in the captioned Petition.

35. In respect of the Petitioner's challenge to the definition of the term 'eco-sensitive land' under Rule 2 (c) of the Impugned Rules, it is submitted that the definition contained in Rule 2 (c) of the Impugned Rules does not compromise RP-2021 and/or alter its character, as alleged by the Petitioner. It is submitted that Section 39A itself contains a safeguard that the alternation/modification must not alter the overall character of the existing Regional Plan and/or Outline Development Plan thus the question of the changes carr*ied out in* Section 39A read with the Impugned Rules altering the character of RP-2021 does not arise. Further, in terms of the land uses permissible under the respective zone as per RP- 2021, in particular, uses permitted on special grounds, the zones included under 'eco-sensitive zone' under Rule 2 (c) are those in respect of which no usage on special grounds is permitted. Whereas, in respect of zones categorized under 'eco-sensitive zone II' under RP-2021 the RP itself contemplates land uses on special grounds

which are in addition to the normal land use permitted for the said zone.

36. In respect of the Petitioner's contention that the notifications issued under Section 39A (*Annexure 8 (colly.)*) seeking inputs from the public are invited without providing adequate information or suppressing available information, it is submitted that the Government has taken a decision to re-issue notifications under Section 39A of the TCP Act for inviting public comments (even in respect of application(s) for which notifications were issued earlier) by providing details such as name of the applicant, village, taluka, survey number, area, existing land use shown in RP/ODP, the change of zone sought by the applicant and decision of the Board.

37. Without prejudice to the aforesaid, I state that the grounds on which the Impugned Section has been challenged in the captioned Petition are similar to the grounds on which the *vires* of Section 17(2) of the TCP Act has been challenged in PIL 16 of 2023, which is presently sub-judice and part heard. It is therefore submitted that given these issues are presently under consideration, no interim relief ought to be granted in favour of the Petitioner.

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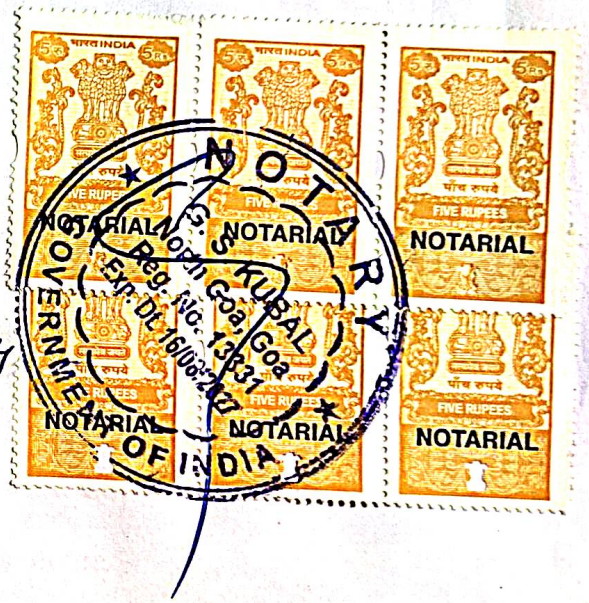
38. In view of the foregoing, I submit that the Petitioner is not entitled to any reliefs as more particularly sought in the captioned Petition, and the captioned Petition deserves to be dismissed *in limine*.

Solemnly affirmed at Porvorim, Goa.
On this10th day of October, 2024.

Deponent

Identified by:

Solemnly affirmed beforeme by
.....Rajesh Naik.....
.....
Reg. No:27/202 Date:10.10.2024
known / Identified to me by.

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